## Case 1:11-cr-00133-TPG Document 84 Filed 02/16/15 Page 1 of 1



## U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

February 16, 2015

## BY ECF

The Honorable Thomas P. Griesa United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Chambers 1630 New York, New York 10007

USDIC SDNY DOCUMENT

United States v. Fadlallah-Cheaitelly et al. Re: S4 11 Cr. 133 (TPG)

Dear Judge Griesa:

The Government writes, with the consent of defendants Jorge Fadlallah-Cheaitelly, Jaime Edery, and Roberto Chavez, through counsel, to respectfully request that the Court adjourn for approximately 30 days the pretrial conference currently scheduled for February 19. The defendants continue to review discovery and contemplate motions, and the parties are discussing pretrial resolutions of this matter.

The Government also moves to exclude from the Speedy Trial Act's operation the time between today and the next conference, in the interests of justice, to afford the defendants adequate time to prepare motions and review discovery, and to afford the parties time to discuss a possible resolution of this matter short of trial. See 18 U.S.C. § 3161(h)(7)(A). Defense counsel have expressly consented to such an exclusion on their clients' behalf.

Respectfully submitted.

PREET BHARARA United States Attorney

/s/ Michael Ferrara Assistant U.S. Attorney 212-637-2526

Cc: Avraham C. Moskowitz, Esq. Lawrence M. Herrmann, Esq. Louis Fasulo, Esq. So Ordered:

7-17-2015